

1 HEATHER E. WILLIAMS, SBN 122664
Federal Defender
2 HOOTAN BAIGMOHAMMADI, SBN 279105
Assistant Federal Defender
3 Designated Counsel for Service
801 I Street, Third Floor
4 Sacramento, CA 95814
T: (916) 498-5700
5 F: (916) 498-5710

6 Attorneys for Defendant
Mr. Wilson
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8 IN THE UNITED STATES DISTRICT COURT
9 FOR THE EASTERN DISTRICT OF CALIFORNIA

10 UNITED STATES OF AMERICA,) Case No. 2:21-cr-00155-JAM
11)
Plaintiff,) **STIPULATION AND ORDER TO CONTINUE**
12) **STATUS CONFERENCE AND EXCLUDE TIME**
vs.)
13) Date: April 23, 2024
JOSHUA WILSON and) Time: 9:00 a.m.
14 CODY CRAMER,) Judge: Hon. John A. Mendez
15)
Defendants.)

16 IT IS HEREBY STIPULATED and agreed by and between United States Attorney
17 Phillip A. Talbert, through Assistant United States Attorney James R. Conolly, counsel for
18 Plaintiff; Federal Defender Heather Williams, through Assistant Federal Defender Hootan
19 Baigmohammadi, counsel for Defendant Joshua Wilson; and Kyle Knapp, counsel for Cody
20 Cramer that the status hearing currently set for April 23, 2024 at 9:00 be continued to June 4,
21 2024 at 9:00 a.m.

22 The parties specifically stipulate as follows:

- 23 1. By previous order, this matter was set for a status on April 23, 2024 at 9:00 a.m.
24 2. By stipulation, Mr. Wilson now moves to continue the status conference to **June**
25 **4, 2024, at 9:00 a.m.**
26 3. To date, the government has produced approximately 850 pages and various
27 audio/video recordings of discovery to the defendants.
28

4. Mr. Wilson and Mr. Cramer require additional time to review the discovery, investigate and research possible defenses, research potential pretrial motions, and explore potential resolutions to the case, and otherwise prepare for trial.
5. Mr. Wilson and Mr. Cramer believe that failure to grant the requested continuance would deny them the reasonable time necessary for effective preparation, taking into account the exercise of due diligence.
6. Neither the government nor Mr. Cramer object to the continuance.
7. For the purpose of computing time under 18 U.S.C. § 3161 *et seq.* (Speedy Trial Act), the parties request that the time period between April 23, 2024 and June 4, 2024, inclusive, be deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(B)(iv) (Local Code T4), because it would result from a continuance granted by the Court at the defense's request, based on a finding that the ends of justice served by granting the continuance outweighs the best interest of the public, Mr. Wilson, and Mr. Cramer in a speedy trial.

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Respectfully submitted,

HEATHER E. WILLIAMS
Federal Defender

Date: April 12, 2024

/s/ Hootan Baigmohammadi
HOOTAN BAIGMOHAMMADI
Assistant Federal Defender
Attorneys for Mr. Wilson

Date: April 12, 2024

/s/ Kyle Knapp
Kyle Knapp
Attorney for Mr. Cramer

Date: April 12, 2024

PHILLIP A. TALBERT
United States Attorney

/s/ James R. Conolly
James R. Conolly
Assistant United States Attorney
Attorneys for Plaintiff

ORDER

The Court, having received and considered the parties' stipulation, and good cause appearing therefrom, **ADOPTS** the parties' stipulation in its entirety as its order.

IT IS SO ORDERED.

Dated: April 16, 2024

/s/ John A. Mendez

THE HONORABLE JOHN A. MENDEZ
SENIOR UNITED STATES DISTRICT JUDGE